

1 DAVID CHIU, State Bar #189542
2 City Attorney
3 YVONNE R. MERÉ, State Bar #173594
Chief Deputy City Attorney
4 TARA M. STEELEY, State Bar #231775
JOHN H. GEORGE, State Bar #292332
5 KAITLYN M. MURPHY, State Bar #293309
SABRINA M. BERDUX, State Bar #248927
6 ABIGAIL H. WALD, State Bar #309110
Deputy City Attorneys
7 City Hall, Room 234
1 Dr. Carlton B. Goodlett Place
8 San Francisco, California 94102-4682
Telephone: (415) 554-4655 (Steeley)
(415) 554-5960 (George)
(415) 554-6762 (Murphy)
(415) 554-3929 (Berdux)
(415) 554-3901 (Wald)
10 Facsimile: (415) 554-4699
E-Mail: tara.steeley@sfcityatty.org
11 john.george@sfcityatty.org
kaitlyn.murphy@sfcityatty.org
12 sabrina.m.berdux@sfcityatty.org
abigail.wald@sfcityatty.org
13
14 Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

15
16 UNITED STATES DISTRICT COURT
17
18 NORTHERN DISTRICT OF CALIFORNIA

19 JANE ROE, an individual; MARY ROE, an
individual; SUSAN ROE, an individual; JOHN
ROE, an individual; BARBARA ROE, an
individual; PHOENIX HOTEL SF, LLC, a
California limited liability company; FUNKY
FUN, LLC, a California limited liability
company; and 2930 EL CAMINO, LLC, a
California limited liability company,

20 Plaintiffs,
21
22

vs.

23 CITY AND COUNTY OF SAN
FRANCISCO, a California public entity,

24 Defendant.
25
26

27 Case No. 4:24-cv-01562-JST

28 STIPULATION AND [PROPOSED] ORDER
EXTENDING DISCOVERY MOTIONS
DEADLINE BY FOUR DAYS

Trial Date: August 10, 2026

STIPULATION

WHEREAS, the fact discovery cutoff was January 5, 2026 (ECF No. 99).

WHEREAS, Civil Local Rule 37-3 provides “[w]here the Court has set separate deadlines for fact and expert discovery, no motions related to fact discovery may be filed more than 7 days after the fact discovery cut-off.”

WHEREAS, under Civil Local Rule 37-3, the last day to file discovery motions related to fact discovery is January 12, 2026.

WHEREAS, the parties are attempting to resolve two remaining discovery disputes related to fact discovery, but Plaintiffs' counsel is unable to meet and confer until on or after January 12, 2026 due to his travel schedule.

WHEREAS, Magistrate Judge Illman's Standing Order Section 4(b) provides the procedure for a party to enforce the Court's meet and confer requirement when the moving party cannot obtain a meeting with the opposing party or its section of a joint discovery letter.

WHEREAS, the parties prefer to seek a brief extension of the Civil Local Rule 37-3 deadline and attempt to resolve their disputes instead of burdening the Court with Defendant's unilateral filing pursuant to Judge Illman's Standing Order.

THEREFORE, IT IS HEREBY AGREED AND STIPULATED that:

1. The deadline provided by Civil Local Rule 37-3 for motions related to fact discovery is extended by four days from January 12, 2026 to January 16, 2026.

Dated: January 12, 2026

DAVID CHIU
City Attorney
TARA M. STEELEY
JOHN H. GEORGE
KAITLYN M. MURPHY
SABRINA M. BERDUX
ABIGAIL H. WALD
Deputy City Attorneys

By: /s/*John H. George*

JOHN H. GEORGE
Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

1
2 Dated: January 12, 2026

WALKUP, MELODIA, KELLY & SCHOENBERGER

3 By: ** /s/Ashcon Minoiefar
4 ASHCON MINOIEFAR

5 Attorneys for Plaintiffs
6 JANE ROE, MARY ROE, SUSAN ROE, JOHN ROE,
7 BARBARA ROE, PHOENIX HOTEL SF, LLC, FUNKY
8 FUN, LLC, and 2930 EL CAMINO, LLC

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
***Pursuant to L.R. 5-1(h)(3), the electronic signatory attests that each of the other Signatories have concurred in the filing of this document.*

1
2 **[PROPOSED] ORDER**
3
4
5
6

7 Pursuant to the parties' stipulation, and for good cause shown, the deadline provided by Civil
8 Local Rule 37-3 for motions related to fact discovery is extended by four days from January 12, 2026
9 to January 16, 2026.
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Date: _____

7 The Honorable Jon S. Tigar
8 UNITED STATES DISTRICT COURT
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28